

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA; and  
RASIER, LLC

Plaintiffs,

v.

CITY OF SEATTLE; SEATTLE  
DEPARTMENT OF FINANCE AND  
ADMINISTRATIVE SERVICES; and FRED  
PODESTA, in his official capacity as Director,  
Finance and Administrative Services, City of  
Seattle,

Defendants.

No. 17-cv-00370-RSL

**STIPULATED MOTION TO  
RENOTE HEARING DATE FOR  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

**NOTED ON MOTION  
CALENDAR:  
JANUARY 30, 2020**

**STIPULATION**

Pursuant to Local Rules 7(d)(1) and 10(g), and Federal Rules of Civil Procedure 34(b)(2) and 29(b), Plaintiffs Chamber of Commerce of the United States of America (the "Chamber") and Rasier, LLC ("Rasier") and Defendants ("Seattle") submit this stipulated motion seeking to renote the hearing date for Plaintiffs' Motion for Summary Judgment (Dkt. #100) from February 7, 2020 to May 8, 2020.

1. On August 7, 2019, Judge Lasnik ordered that Plaintiffs' Motion for Summary Judgment be renoted for hearing on February 7, 2020 to allow Seattle to conduct certain discovery (Dkt 109).

2. Seattle has served requests for production on the Chamber and Rasier, and has served a subpoena on Lyft, Inc. The Chamber, Rasier, and Lyft have provided written responses and objections to Seattle's discovery.

3. On December 23, 2019, the Chamber and Seattle filed a joint submission under LCR 37 regarding requests for production to the Chamber. The motion sought to resolve certain discovery issues and remains pending.

4. The parties are also engaged in discussions and negotiations concerning a protective order, discovery, and other issues pertaining to the claims in this lawsuit.

5. To allow the Court and parties sufficient time to address these issues, the parties agree that Plaintiffs' Motion for Summary Judgment should be renoted for hearing on May 8, 2020.

6. No party will be prejudiced by the proposed scheduling changes.

IT IS SO STIPULATED.

DATED this 30th day of January, 2020.

Respectfully submitted,

By: s/ Robert J. Maguire  
Robert J. Maguire, WSBA 29909  
Douglas C. Ross, WSBA 12811  
DAVIS WRIGHT TREMAINE  
Suite 3300  
920 Fifth Avenue  
Seattle, WA 98104-1610  
(206) 622-3150  
(206) 757-7700 FAX  
robmaguire@dwt.com

*Attorneys for Plaintiff Rasier, LLC*

By: s/ Timothy J. O'Connell (via email auth)  
Timothy J. O'Connell, WSBA 15372  
STOEL RIVES LLP  
600 University Street, Suite 3600  
Seattle, WA 98101  
(206) 624-0900  
(206) 386-7500 FAX  
Tim.oconnell@stoel.com

Michael A. Carvin  
(D.C. Bar No. 366784)  
(pro hac vice)

Christian G. Vergonis  
(D.C. Bar No. 483293)  
(pro hac vice)

Jacqueline M. Holmes  
(D.C. Bar No. 450357)  
(pro hac vice)

By: s/Jessica Nadelman (via email auth.)

PETER S. HOLMES

*Seattle City Attorney*

JESSICA NADELMAN

SARA O'CONNOR-KRISS

*Assistant City Attorneys*

Seattle City Attorney's Office

701 Fifth Avenue, Suite 2050

Seattle, WA 98104

(206) 684-8200

STEPHEN P. BERZON (pro hac vice)

STACEY M. LEYTON (pro hac vice)

P. CASEY PITTS (pro hac vice)

Altshuler Berzon LLP

177 Post Street, Suite 300

San Francisco, CA 94108

(415) 421-7151

*Attorneys for Defendants*

*City of Seattle et al.*

Robert Stander

(D.C. Bar No. 1028454)

(pro hac vice)

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

(202) 879-3939

(202) 616-1700 FAX

mcarvin@jonesday.com

Steven P. Lehotsky (pro hac vice)

(D.C. Bar No. 992725)

U.S. CHAMBER LITIGATION CENTER

1615 H Street, N.W.

Washington, D.C. 20062

(202) 463-3187

slehotsky@uschamber.com

*Attorneys for Plaintiff*

*Chamber of Commerce of the*

*United States of America*